## REMARKS

**Status of Claims**

Claims 1-24 and 26-28 are pending in this application. Claims 1, 8, 12, 14 and 19 have been amended. Reconsideration of the rejection of all claims and allowance are earnestly requested in view of the amendments and the following remarks.

**Rejections under 35 U.S.C. § 103(a)**

Claims 1-24 and 26-28 were rejected under 35 U.S.C. §103(a) as being unpatentable over Bornstein (U.S. Patent No. 6,144,388) in view of Quintero et al. (U.S. Patent No. 5,293,479) herinafter Quintero. This rejection is respectfully traversed.

Bornstein cannot be combined with Quintero because any effort to add the functionality of Quintero to Bornstein will destroy the functionality of Bornstein. This is due to the fact that Quintero, column 8, lines 5-15 expressly teaches that a Rule Base limits selections available based on the underlying component, whereas Bornstein expressly teaches away from limiting the selections associated with a components. Rather Bornstein, column 16, lines 45-65 and column 19, lines 33-45, provides a user with all options for an articles of clothing stored on a web server.

Bornstein expressly teaches a method and system of generating a two-dimensional image of an article of clothing superimposed on an image of a person. Bornstein, column 18, lines 18-35, discloses that a generic three-dimensional article of clothing is created as a representative for all articles of clothing having the same type. In column 18, lines 40-55, a graphic designer divides the generic three-dimensional article into components and associates an assembly order with each component. In column 20, lines 10-45, the three-dimensional article is manually manipulated by an operator to fit the image of person. In column 21, lines 35-40 an article of clothing is selected by a user. Bornstein, column 22, lines 5-10 further discloses that the selected article of clothing is a "rendered three-dimensional model," which means a two dimensional image of the component is displayed on the image of a person. Bornstein, column 22, lines 53-60, discloses that the two-dimensional image of the components are assembled according to the assembly order associated with the generic article of clothing.

In contrast, Quintero discloses a method and system that organizes components based on characteristics of the components and predetermined rules. Quintero, column 6, lines 36-40, discloses a design tool that designs legal assemblies and not illegal assemblies. In column 7, lines 50-55, rules are used in the design process to allow proper combinations and to disallow improper combinations. In column 8, lines 5-15, the rules are utilized to constrain the design process by limiting selections that are appropriate based on the stage of design. Quintero, column 9, lines 45-50 further discloses that the user is not allowed to manipulate the graphics directly. Moreover, Quintero, column 28, line 35-37, discloses design checks that involve local and global design rules. In column 29, lines 32-40, changes and additions can be made to the design, with or without user intervention, where the changes are limited to adding end or top caps, height changes or wiring harnesses where the design defaults only allow a single choice for a missing component. In column 29, lines 45-55, the check may generate a clean pass, warning, or failure.

As illustrated by the disclosures of Bornstein and Quintero, the alleged combination of Quintero's rules and design check would render Bornstein incapable of superimposing any article of clothing on a picture of a person. Rather, Bornstein would be limited to only combinations that were deemed suitable by a designer as disclosed by Quintero in column 11, lines 23-40.

Even if Bornstein and Quintero could be combined without destroying the functionality of one of the references, Bornstein and Quintero fail to disclose or suggest the requirements of claims 1 and 7, such as "accessing a table having pairs of identifiers that are incompatible, and based on the first and second identifiers traversing the table to determine whether said first component image and said second component image are compatible."

The Office Action concedes that Bornstein fails to explicitly teach determining whether said first and second component images are compatible. Because Bornstein does not disclose compatibility determinations, it follows that Bornstein does not disclose utilizing a table having pairs of identifiers that indicate incompatibility.

The Office Action cites Quintero, column 12, lines 34-64 to provide the claimed compatibility determinations. As indicated above, Quintero, column 7, lines 48-55, utilizes rules to provide a design process that ensures proper component combinations are formed. Quintero

constraints the menu selection to prevent improper combinations. At best, Quintero discloses compatibility determinations that are utilized to limit menu selections.

Bornstein and Quintero singularly and in combination fail to suggest a table having pairs of identifier that may be utilized to determine that components associated with the identifiers are incompatible. Unlike Quintero, embodiments of the invention does not limit selection to only compatible selections. Rather a user is allowed to select incompatible selections. Furthermore, unlike Bornstein and Quintero a table having pairs of identifiers that indicate incompatible components is traversed to determine whether a first and second component image are compatible. Accordingly for at least the foregoing reasons the 35 U.S.C. § 103(a) rejection of claims 1 and 7 should be withdrawn and claims 1 and 7 are allowable.

Claims 2-6 depend on claim 1 and further define novel features of the claimed invention. Accordingly, claims 2-6 are allowable by virtue of their dependence on claim 1.

With respect to claims 8, 10, 11, 14, 16, and 17, Bornstein and Quintero singularly and in combination fail to disclose or suggest, among other things, "automatically detecting and replacing incompatible image selections."

The Office Action seems to concede that Bornstein does not disclose the claimed requirement of automatically detecting and replacing incompatible image selections. The Office Action suggests that Quintero, column 9, lines 38-65, discloses the claimed requirement. As discussed above, Bornstein does not make compatibility determinations, instead Bornstein, column 22, lines 55-60, discloses component assembly orders that allows an article of clothing to be superimposed on a picture. On the other hand, Quintero, column 7, lines 48-55 and column 8, lines 5-15 disclose compatibility determinations that limit menu selections to ensure that only proper combinations are selected by a user. At most, Quintero, column 29, lines 33-40, discloses that in response to a rule check changes may include adding end or top caps, height change packages, or wiring harnesses where only a single choice for a missing component based on the design defaults.

Unlike Bornstein and Quintero, in the claimed embodiment incompatibilities are automatically detected and incompatible components are replaced with compatible replacement components. While Quintero limits options presented to a user to only legal or compatible

selections, in accordance with the claimed embodiment the user is allowed to make incompatible selections that are later corrected. Accordingly for at least the foregoing reasons the 35 U.S.C. § 103(a) rejection of claims 8, 10, 11, 14, 16, and 17 should be withdrawn and claims 8, 10, 11, 14, 16, and 17 are allowable.

Claims 9, 15, 26 and 28, depend on claim 8 and 14 and further define novel features of the claimed invention. Accordingly, claims 9, 15, 26 and 28 are allowable by virtue of their dependence on claims 8 and 14.

With respect to claim 12, Bornstein and Quintero singularly and in combination fail to disclose or suggest, among other things, "a compatibility component which utilizes identifiers associated with said plurality of component images to generate notifications when component images of the configured graphical image conflict."

The Office Action seems to suggest that Bornstein discloses all the claimed requirements, including the compatibility component. Applicants respectfully disagree. As indicated above Bornstein does not make compatibility determinations. The Office Action relies on column 5, lines 11-39 and column 18, lines 1-17. The portions cited by the Office Action disclose converting a three-dimensional article of clothing to a two-dimensional image based on a assembly order associated with the three-dimensional article. Nothing in Bornstein discloses or suggests generating notifications when component images of the configured graphical image conflict.

On the other hand, Quintero, column 9, lines 10-15 discloses generating messages during the design process. In column 29, lines 45-60. the messages may include a clean pass, warning or failure. When an assembly satisfies all global and local rule a clean pass or no notification is generated. However, if there is a problem either a warning or failure is generated. Quintero does disclose generating a message when an assembly does not pass the global and local rules. However, this message generation process is separate and distinct from the claimed compatibility component that utilizes identifiers associated with a plurality of component images to generate notifications when component images of configured graphical image conflict.

Unlike Bornstein and Quintero, claimed embodiments utilize identifiers associated with the component images to generate a notification when the component image conflicts with the configure

graphical image. Nothing in Bornstein or Quintero discloses or suggests a compatibility component that operates as discussed above. Accordingly for at least the foregoing reasons the 35 U.S.C. § 103(a) rejection of claim 12 should be withdrawn and claims 12 is allowable.

Claims 13 and 27 depends on claim 12 and further define novel features of the claimed invention. Accordingly, claims 13 and 27 are allowable by virtue of their dependence on claim 12.

With respect to claim 18, Bornstein and Quintero singularly and in combination fail to disclose or suggest, among other things, "a compatibility table, said compatibility table containing entries indicative of replacement component images of the one or more component images."

The rejection of claim 18 is unclear. The Office Action does not provide a citation to either reference that discloses or suggests the claimed compatibility table. As discussed above Bornstein does not perform compatibility determinations. Because Bornstein lacks this feature, it follows that Bornstein does not disclose a compatibility table. The Office Action seems to be relying on Quintero to provide the missing compatibility functionality. As discussed above Quintero utilizes rules to constrain selections to legal or proper combinations. Quintero does not disclose or suggest replacement component images for one or images of a configured product. At best Quintero, column 7, lines 65-69 discloses a menu selection rule and global rules that ensure design integrity.

Unlike Bornstein and Quintero, claimed embodiments utilize a compatibility table having replacement component images for one or more component images of a configured product. The compatibility table provides the one or more replacement components to replace a component that is incompatible with the configured product. Accordingly for at least the foregoing reasons the 35 U.S.C. § 103(a) rejection of claim 18 should be withdrawn and claims 18 is allowable.

Similarly with respect to claim 19, Bornstein and Quintero singularly and in combination fail to disclose or suggest, among other things, "positioning, on a coordinate system, said first component image and said second component image, wherein positioning comprises determining whether said first component image and said second component images are compatible via identifiers associated with said first and second component images."

The Office Action concedes that Bornstein does not discloses the claimed compatibility

determinations. The Office Action cites Quintero to provide the missing requirements. As discussed above Quintero, column 7, lines 50-55 and column 8, lines 4-10, discloses rules that limit menu selections to ensure proper combinations. Quintero does not mention or suggest identifiers that indicate compatibility of first and second component images. Rather Quintero prevents selection of incompatible components.

Unlike Bornstein and Quintero, the claimed embodiment provides compatibility determinations by utilizing identifiers associated with the components. The identifiers may indicate that the first and second component are incompatible. Unlike Bornstein and Quintero, the user is not constrained to legal or proper combinations. Accordingly for at least the foregoing reasons the 35 U.S.C. § 103(a) rejection of claim 19 should be withdrawn and claims 19 is allowable.

Claims 20-24 depend from claim 19 and further define novel features of the claimed invention. Accordingly, claims 20-24 are allowable at least by virtue of their dependence on claim 19.

**Conclusion**

As set forth above, applicants respectfully submit that all pending claims are in condition for allowance. Applicants respectfully request that this application be allowed and passed to issue. Should, however, any issues remain prior to issuance of this application, the Examiner is urged to contact the undersigned to resolve the same. The Commissioner is hereby authorized to charge any additional amount required, or credit any overpayment, to Deposit Account No. 21-0765.

Respectfully submitted,

Date: June 9 2006

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